

# **EXHIBIT B**

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UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

-----X  
VIRGINIA L. GIUFFRE,

Plaintiff,

- against -

Case No. :  
15-cv-07433-RWS

GHISLAINE MAXWELL,

Defendant.

-----X

\* \* CONFIDENTIAL \* \*

Continued Videotaped Deposition of  
GHISLAINE MAXWELL, the Defendant herein,  
taken pursuant to subpoena, was held at  
the law offices of Boies, Schiller &  
Flexner, LLP, 575 Lexington Avenue, New  
York, New York, commencing July 22,  
2016, 9:04 a.m., on the above date,  
before Leslie Fagin, a Court Reporter  
and Notary Public in the State of New  
York.

— — —

MAGNA LEGAL SERVICES  
1200 Avenue of the Americas  
New York, New York 10026  
(866) 624-6221

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2 thought. I really don't recall her, so it's  
3 hard for me to testify what I thought about  
4 her age at the time.

5 Q. Was Virginia, in the period of  
6 around 2000, the youngest person that, as you  
7 understood it, was giving Mr. Epstein  
8 massages?

9 MR. PAGLIUCA: Object to the form  
10 and foundation.

11 A. Again, I can't testify to her age,  
12 but everybody else that I can recall seemed  
13 to be again, like I would say, adults.

14 Q. You didn't think Virginia was an  
15 adult, did you?

16 MR. PAGLIUCA: Object to the form  
17 and foundation.

18 A. Like I said, I don't recall her. I  
19 don't recall thinking about -- my memory is  
20 of adults giving Jeffrey massages, and as I  
21 don't really remember Virginia around that  
22 time, I don't know what I think.

23 Q. You do remember Virginia, about  
24 that time back in the 2000s, giving  
25 Mr. Epstein massages?

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2 MR. PAGLIUCA: Object to the form  
3 and foundation.

4 A. I barely remember her at all.

5 Q. Whether you barely remember her or  
6 not, you do remember that back in the period  
7 around 2000, Virginia was giving Mr. Epstein  
8 massages, right?

9 MR. PAGLIUCA: Objection to form  
10 and foundation.

11 A. Only in the most general terms. It  
12 would be somebody who would give him a  
13 massage, and that's it.

14 Q. During the period of time back in  
15 the period around 2000, when you knew that  
16 Virginia was somebody who would give  
17 Mr. Epstein a massage, was she somebody who  
18 you considered an adult?

19 MR. PAGLIUCA: Objection to form  
20 and foundation.

21 A. I didn't consider her at all  
22 because she is not somebody that I really  
23 interacted with.

24 Q. It is your testimony that Virginia  
25 was not somebody that you interacted with, is

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2 Epstein's home in Palm Beach?

3 MR. PAGLIUCA: Objection to form

4            and foundation.

5 A.

— 100 —

— 100 —

— 100 —

— 10 —

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\_\_\_\_\_

\_\_\_\_\_

13 Q.

— 10 —

— 20 —

— 100 —

[illegible]

— 100 —

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2 Q. [REDACTED]

3 [REDACTED] [REDACTED]

4 [REDACTED] [REDACTED]

5 A. [REDACTED]

6 [REDACTED] [REDACTED]

7 A. [REDACTED]

8 [REDACTED] [REDACTED]

9 [REDACTED] [REDACTED]

10 [REDACTED] [REDACTED]

11 Q. [REDACTED]

12 [REDACTED] [REDACTED]

13 [REDACTED] [REDACTED]

14 [REDACTED] [REDACTED]

15 [REDACTED] [REDACTED]

16 [REDACTED] [REDACTED]

17 [REDACTED] [REDACTED]

18 [REDACTED] [REDACTED]

19 [REDACTED] [REDACTED]

20 [REDACTED] [REDACTED]

21 [REDACTED] [REDACTED]

22 [REDACTED] [REDACTED]

[REDACTED] [REDACTED]

[REDACTED] [REDACTED]

[REDACTED] [REDACTED]

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2 MR. PAGLIUCA: Objection to form  
3 and foundation.

4 A.

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8 MR. PAGLIUCA: Objection to form  
9 and foundation.

10 A.

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14 Q. [REDACTED]

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\_\_\_\_\_

21 [REDACTED]

□ \_\_\_\_\_

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\_\_\_\_\_, \_\_\_\_\_, \_\_\_\_\_

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2 Q. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

7 [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

11 [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

20 [REDACTED]

21 MR. PAGLIUCA: Objection to form

22 and foundation.

23 [REDACTED]

24 [REDACTED]

[REDACTED]



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2 and foundation.

3 A. No.

4 Q. [REDACTED]

■ [REDACTED]

■ [REDACTED]

■ [REDACTED]

8 MR. PAGLIUCA: Objection to form

9 and foundation.

10 A. I don't know.

11 ■ [REDACTED]

■ [REDACTED]

■ [REDACTED]

■ [REDACTED]

■ [REDACTED]

■ [REDACTED]

17 MR. PAGLIUCA: Objection to form

18 and foundation. Asked and answered.

19 A. No.

20 Q. Were they ever in the Virgin

21 Islands?

22 MR. PAGLIUCA: Objection to form

23 and foundation.

24 A. No.

25 ■ [REDACTED]

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[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

8 [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

17

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

23

[REDACTED]

24

MR. PAGLIUCA: Objection to form

25

and foundation.

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2 it to something in the case.

3 MR. BOIES: I think it's tied, but

4 if you instruct her not to answer, it

5 goes into the --

6 MR. PAGLIUCA: Meat grinder.

7 BY MR. BOIES:

8 Q. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED] [REDACTED] .

14 A. Can you repeat the question?

15 Q. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

20 MR. PAGLIUCA: Same objection.

21 A. No.

22 Q. [REDACTED]

[REDACTED]

24 . [REDACTED]

[REDACTED]

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CERTIFICATE

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Leslie Fagin,

Registered Professional Reporter

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Dated: July 22, 2016

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